

U.S. BANKRUPTCY COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

FILED '20 MAR 6
BANKR SD IND PM 3:37

IN RE:)
)
 ELLINGTON TRUCKING, LLC) CASE NO. 17-00781-RLM-11
)
 17-00781-RLM-11)

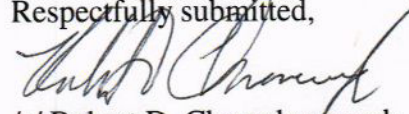
MOTION TO REINSTATE ECF PRIVILEGES

Comes now Robert D. Cheesebrough, counsel for Ellington Trucking, LLC, and moves the court for an order reinstating his electronic computer filing privileges and in support states as follows:

1. Counsel Cheesebrough was ordered to disgorge \$4150.00 in fees he received from his client Ellington Trucking, LLC during the course of his representation.
2. Appurtenant to said order Counsel Cheesebrough's ECF filing privileges were suspended by the court until the sum was paid in full.
3. Full payment of the ordered sum to Ellington Trucking has been made and no other amounts are due and owing at this time. A copy of the *Affidavit* produced by Sharon Harris, the *Stipulation of Settlement* entered into by Robert Cheesebrough and Ellington Trucking, and receipt of payment are attached.
4. Counsel Cheesebrough requires an immediate reinstatement of his ECF privileges to represent existing and future clients without hearing on the motion.
5. Counsel Cheesebrough has communicated with Harrison Strauss with the U.S. Trustee and informed him that full payment has been made.

WHEREFORE, Counsel requests that the court enter an order reinstating Robert Cheesebrough's ECF privileges immediately without hearing to expedite counsel's ability to represent other clients.

Respectfully submitted,



/s/ Robert D. Cheesebrough

Robert D. Cheesebrough

5410 Tanglewood Lane

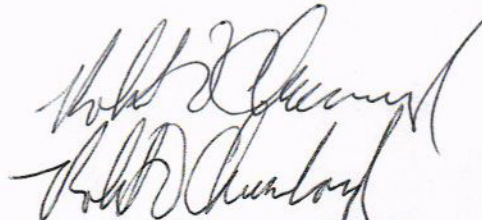
Whitestown, Indiana 46075

Ph. 317.374.4567

robertcheesebrough@gmail.com

CERTIFICATE OF FILING AND SERVICE

I hereby certify that on this 6th day of March, 2020, the foregoing was filed and served upon the U.S. Trustee by first class U.S. mail, postage prepaid or by placement of the same in the U.S. Trustee's box at the clerk's office.



/s/ Robert D. Cheesebrough

Robert D. Cheesebrough

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

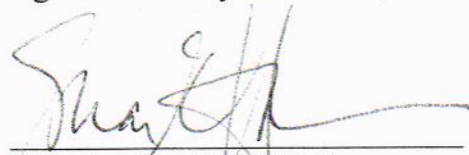
IN RE: ELLINGTON TRUCKING, LLC)
)
Debtor.)
)
)
)

Case No. 17-00781-RLM

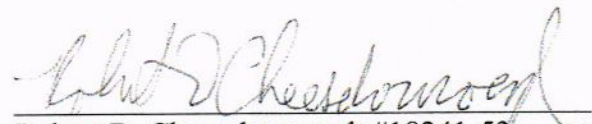
STIPULATION OF SETTLEMENT

It is hereby stipulated this 30th day of November 2018, by and between the above-referenced party and their legal counsel, Robert D. Cheeseborough ("Counsel"), that Counsel does owe and will pay to Ellington Trucking, LLC ("Ellington"), at 1829 Blankenship Drive, Indianapolis, Indiana 46217, the total sum of \$4,150.00 ("Total Sum"), to be paid with a credit given to Counsel for work already performed and due Counsel totaling \$950.00 and five monthly installment payments of Eight Hundred Dollars \$800.00 per month due on or before January 20, 2019, and payable on the 20th day of each month thereafter until such Total sum is paid in full, then Debtor shall enter the above-captioned matter as "SETTLED IN FULL" to this Court, Should Defendant default however on the payments(s) as herein provided, and fails to cure said defects within ten (10) days after associated written notice to Counsel at his address of record, then Counsel shall consent to a judgement in the amount of \$4,150.00, plus costs of any proceedings for collections, and less monies paid.

Agreed to hereby the Parties,



Ellington Trucking, LLC
By, Sharon Harris, President
1829 Blankenship Drive
Indianapolis, Indiana 46217



Robert D. Cheeseborough #18241-53
2272 Wynnedale Road
Indianapolis, Indiana 46228

Save this Copy
for your records.



326996

CASHIER'S CHECK - Customer Receipt

February 05, 2020

Pay to the
Order of: SHARON HARRIS***

\$*****3,200.

Amount: THREE THOUSAND TWO HUNDRED 00/100 US DOLLARS

Memo: ELLINGTON TRUCKING DISGORGEMENT
Purchased by: ROBERT D CHEESEBOUROUGH
Transaction #: 13976214
Cost Center: 4341
Method of Purchase: Cash/Check

NON-NEGOTIABLE

The purchase of a Surety Bond may be required before any Cashier's Check on this bank will be replaced or refunded in the event it is lost, misplaced, or stolen.

U.S. Bankruptcy Court
Southern District of Indiana
Indianapolis Division

IN RE:

Ellington Trucking, LLC

17-00781-RLM-11

AFFIDAVIT

I do swear and affirm under penalty of perjury that the following is true to the best of my understanding.

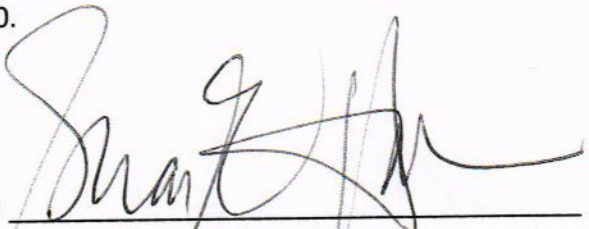
1. My name is Sharon Harris. I am the owner and President of Ellington Trucking, LLC.
2. I was represented by Robert D. Cheesebrough in the bankruptcy filed under the above listed case. Mr. Cheesebrough was ordered to repay me the \$4150.00 I paid him for legal services in this case.
3. On February 5, 2020, Mr. Cheesebrough made pay totaling \$3,200.00 to pay in full the balance owed.
4. The amounts I paid Mr. Cheesebrough are now repaid in full. There are no outstanding amounts owed to me by Mr. Cheesebrough.
5. I sent Harrison Strauss with the U.S. Trustee Office notice that Mr. Cheesebrough made the final payment on February 5, 2020.

Further affiant sayeth not.

Date:

3/6/2020

Signature of Affiant:



Sharon Harris